

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

CRIMINAL NO. 22-CR-20561

Plaintiff,

v.

D-1 Sean Tissue

Defendants.

/

STIPULATED PROTECTIVE ORDER

IT IS HEREBY STIPULATED AND AGREED by and between the United States of America and the defendants, through their respective counsel of record herein, as follows:

The government will provide to the defense discovery in this matter, solely for the purpose of meeting its obligations under Rule 16, Fed.R.Crim.P., and to enable the defense to prepare its defense. The parties understand that these materials are provided for these purposes, and not for further dissemination or for any purpose other than the preparation of a defense and litigation of this case.

In addition, these discovery materials contain statements from witnesses and sources of information. It is the government's concern that giving these materials

directly to the defendant could result in witness intimidation.

THEREFORE, the parties stipulate and agree to the following:

1. This Court may enter protective orders pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, and its general supervisory authority.
2. This order pertains to all discovery materials provided to or made available to defense counsel as part of discovery in this matter. This includes all discovery provided in electronic form as well as any discovery provided in hard copy form.
3. By signing this Stipulation and Protective Order, defense counsel agrees not to share any discovery materials with anyone other than defense counsel, designated defense investigators, defense counsel's support staff, or other designated individuals necessary for assisting the defense in the preparation and trial of this matter. Defense counsel may permit the defendant to view discovery materials in the office of his counsel or in the presence of counsel but defendant, however, must not retain a copy of discovery materials and must return such materials to defense counsel upon completion of his review of the documents. The parties agree that defense counsel, defense investigators, and support staff shall not allow the defendant to copy or retain copies of discovery materials.
6. Defense counsel shall be responsible for advising his respective

defendant, employees, and other members of the defense team of the contents of this Stipulation and Protective Order. Any unauthorized disclosure may constitute a violation of this Court's order.

7. In the event that the defendant substitutes counsel, undersigned defense counsel agrees to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by this order.

8. The defendant reserve the right to seek modification of this order after defense counsel has had the opportunity to review discovery produced by the United States.

SO ORDERED.

Dated: January 23, 2023
Detroit, Michigan

s/Mark A. Goldsmith
MARK A. GOLDSMITH
United States District Judge

IT IS SO STIPULATED.

/s Craig A. Weier
Craig A. Weier
Assistant United States Attorney

/s John R. Minock with consent
John R. Minock
Attorney for Sean Tissue

Dated: January 18, 2023